its policy if it is challenged in the Circuit Court. Any

(Footnote Continued)
subject. On February 12, 1992 AT&T wrote to Chairman Sikes urging the elimination of regulation of long distance telecommunications prices and services. Specifically, AT&T stated that:

> Continued economic regulation of long distance telecommunications prices and services is costing American business hundreds of millions of dollars in lost savings and lost opportunities....
>
> * * * * *
>
> Regulation that results in reduced innovation and higher prices translates into reduced competitiveness and higher costs for U.S. firms. Costs of harmful regulatory policy can be measured in lost jobs and dampened growth of American industry.
>
> * * * * *
>
> Long distance customers have choices in the marketplace, they are aware of their choices, and they act on those choices. In such a competitive environment, asymmetrical long distance regulation reduces competitive pressures and protects AT&T's rivals. Customers do not need protection -- in fact, customers are harmed by excessive regulation which they disdain.
>
> * * * * *
>
> We commend the Commission for taking a hard look at ways to reduce unnecessary regulatory burdens, particularly as they deny this nation the benefits of full competition in the long distance marketplace.

Letter from T. H. Norris, Corporate Vice President, AT&T to Chairman Sikes.

AT&T's proposals here would appear both overly ambitious
(Footnote Continued)

other course would reflect a timidity and lack of purpose totally inconsistent with the Commission's obligation to regulate consistent with the public interest.[16]

(Footnote Continued)
and overly self-serving. If regulation is as bad and as costly as AT&T argues, it would surely provide a strong incentive for the Commission not to return to a regime in which all non-dominant carriers are required to file tariffs for basic services. At the same time, in the name of "symmetrical regulation," AT&T argues that it should not be required to do any more than any other common carrier despite the obvious disparity in market power between itself and its rivals and despite the fact that the Commission would unquestionably be unable to give careful review to all tariffs filed by all carriers. The asymmetrical regulation which presently exists is simply a concomitant of the asymmetry in market power between AT&T and other interexchange carriers. Plainly, to eliminate that asymmetry, to place additional burdens on carriers without market power, and, at the same time, to eliminate any vestige of regulation for AT&T makes absolutely no sense from the standpoint of regulatory policy.

[16]In Question (d) the Commission asks whether "additional streamlining" could be permitted for carriers currently subject to forbearance and "if so, what sort of additional streamlining might be appropriate?" Sprint does not believe that additional streamlining is either called for as a matter of policy or that such streamlining could be legally justified. The main obligation for streamlined carriers--other than the obligation to file tariffs--is that they must wait 14 days for these tariffs to become effective. Sprint believes that a 14-day notice period is the minimum needed to allow the Commission (and interested parties) the opportunity to review a tariff before it becomes effective. Such advance review is essential. The Supreme Court has emphasized that similar requirements of the Interstate Commerce Act were intended to give the Commission full opportunity for investigation "before" a tariff becomes effective (U.S. v. Chesapeake and Ohio Railway Company, 426 U.S. 500, 513 (1976) (emphasis in the original)). Even AT&T, had argued at length that such an abbreviated 14-day filing period is irreconcilable with the Commission's duties and obligations under the Act (See Initial Comments of American Telephone & Telegraph Company, CC Docket No. 79-252, February 15, 1980). It claimed that "a short notice period of 14 days is usually inadequate for any kind of a realistic evaluation of substantive tariff filings" (id. at 57), and that such evaluation "is the very fabric of the statutory scheme

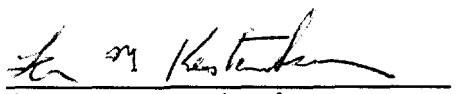
(Footnote Continued)

IV. CONCLUSION

For the reasons stated above, the Commission should continue its long-standing policy of "voluntary forbearance" for non-dominant carriers.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.



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March 30, 1992

(Footnote Continued)
embodied in Section 204 of the Act" (id. at 65, fn. omitted). If 14 days is inadequate, as AT&T argues, a fortiori, a 14-day notice period would not allow for the required "advance" review and would therefore be contrary to the requirements of the Communications Act.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Comments of Sprint Communications Company L.P." was sent by first-class mail, postage prepaid, on this the 30th day of March, 1992, to the below-listed parties:

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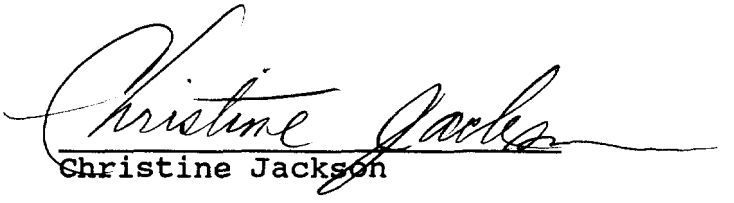

Christine Jackson

March 30, 1992

* BY HAND